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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SCOTT ALLAN, an individual,

Plaintiff,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY dba PROGRESSIVE INSURANCE;
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No: 2:22-cv-01424-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Ninth Request)**

Defendant PROGRESSIVE NORTHERN INSURANCE COMPANY, and Plaintiff

SCOTT ALLAN, through their respective counsel, submit the foregoing stipulation and order to
extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/06/2022
Defendant's Initial Rule 26(a) Disclosures	11/09/2022
Defendant's First Set of Requests for Admission, Requests for Production and Interrogatories to Plaintiff	12/07/2022
Plaintiff's First Supplemental Rule 26(a) Disclosures	12/27/2022
Plaintiff's responses to Defendant's First Set of Requests for Admission, Request for Production and Interrogatories	01/10/2023
Plaintiff's Second Supplemental Rule 26(a) Disclosures	01/10/2023
Plaintiff's First Set of Interrogatories and Requests	01/20/2023

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Item	Date Completed
for Production to Defendant	
Plaintiff's Supplemental Responses to Defendant's First Requests for Production of Documents and Defendant's First Set of Interrogatories	02/03/2023
Plaintiff's Third Supplemental Rule 26(a) Disclosures	02/03/2023
Deposition of Plaintiff Scott Allan	02/06/2023
Defendant's First Supplemental Rule 26(a) Disclosures	02/09/2023
Defendant's Designation of Expert Witnesses	02/21/2023
Plaintiff's Designation of Expert Witnesses	02/21/2023
Defendant's Responses to Plaintiff's First Set of Requests for Production of Documents and Answers to Plaintiff's First Set of Interrogatories	03/13/2023
Plaintiff's First Supplemental Designation of Expert Witnesses	06/23/2023
Plaintiff's Fourth Supplemental Rule 26(a) Disclosures	06/23/2023
Defendant's First Supplemental Designation of Expert Witnesses	06/23/2023
Defendant's Second Supplemental Rule 26(a) Disclosures	07/26/2023
Plaintiff's Fifth Supplemental Rule 26(a) Disclosures	08/07/2023
Plaintiff's Initial Rebuttal Expert Disclosure	08/23/2023
Plaintiff's First Supplemental Rebuttal Expert Disclosure	08/24/2023
Defendant's Initial Rebuttal Expert Disclosure	08/25/2023
Defendant's First Supplemental Rebuttal Expert Disclosure	08/25/2023
Plaintiff's Sixth Supplemental Rule 26(a) Disclosures	09/08/2023
Deposition of Joseph J. Schifini, MD	09/18/2023
Plaintiff's Second Supplemental Expert Disclosure	09/27/2023
Defendant's Third Supplemental Rule 26(a) Disclosures	12/12/2023
Plaintiff's Seventh Supplemental Rule 26(a)	01/22/2024

Item	Date Completed
Disclosures	
Plaintiff's Second Supplemental Responses to Defendant's First Set of Interrogatories	01/22/2024
Plaintiff's Supplemental Responses to Defendant's First Requests for Production of Documents	01/22/2024
Deposition of Dr. Joseph Solberg	01/26/2024
Deposition of Steven Grimm, Ph.D.	02/08/2024
Plaintiff's Eighth Supplemental Rule 26(a) Disclosures	02/13/2024
Defendant's Third Supplemental Rule 26(a) Disclosures	03/01/2024

2. Discovery Remaining

The following discovery remains to be completed:

- a) Dr. Fishell's deposition has been scheduled for March 18, 2024;
- b) Dr. Garber's deposition has been scheduled for April 9, 2024;
- c) Additional Written Discovery;
- d) Deposition of Person(s) Most Knowledgeable for Defendant;
- e) Deposition(s) of percipient witnesses;
- f) Deposition(s) of treating physicians;
- g) Deposition(s) all remaining expert witnesses; and
- h) Additional discovery as necessary.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on April 25, 2024. Although discovery has diligently progressed, additional time is required to complete the remaining depositions due to scheduling conflicts and delays arising from trial preparation in other matters and delays experienced with receiving Plaintiff's medical records and documents regarding an accident which occurred in 2023. As such, the parties believe that good cause exists to warrant extending the discovery cut off deadline and hereby request a 60 day extension of the remaining discovery deadlines to allow for additional time to complete the remaining discovery.

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4. Proposed Schedule for Completing Discovery

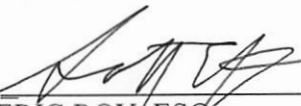
Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	November 24, 2022	No Extension Requested
Expert Designations	June 21, 2022	No Extension Requested
Rebuttal Expert Designations	August 25, 2023	No Extension Requested
Discovery Cut-off	April 25, 2024	June 24, 2024
Dispositive Motions	May 28, 2024	July 29, 2024
Joint Pre-Trial Order	June 25, 2024	August 26, 2024

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: March 6, 2024

ERIC ROY LAW FIRM

By: 
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DATED: March 6, 2024

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By: /s/ William H. Pruitt
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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: March 6, 2024

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